

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**PRIVATE PLAINTIFFS' OPPOSED MOTION TO EXTEND THE DEADLINE
TO FILE THEIR REPLY IN SUPPORT OF THEIR MOTIONS TO COMPEL
REGARDING PORTIONS OF DEPOSITIONS SUBJECT TO LEGISLATIVE
PRIVILEGE OBJECTIONS**

Private Plaintiffs¹ respectfully request an extension of their deadline to file a consolidated reply in support of their motions to compel regarding portions of depositions subject to legislative privilege objections, from Friday, August 26, 2022 to Wednesday, August 31, 2022. *See* Dkts. 543 and 555. The Legislators stated that they would agree to an extension until August 29, 2022, but oppose a request for an extension until August 31, 2022

Private Plaintiffs request an extension to ensure that they have sufficient time to assess and respond to the Legislators' 25-page brief in opposition to Private Plaintiffs' motions, *see* Dkt. 551, especially in light of other briefing deadlines. Private Plaintiffs are currently preparing for filing Friday their portions of the parties' joint advisory as requested by the Court. *See* Dkt.

¹ Private Plaintiffs include: LULAC Plaintiffs, the Mexican American Legislative Caucus ("MALC"), Texas NAACP, the Fair Maps Plaintiffs, the Brooks Plaintiffs, the Black Congressperson Intervenors, and Plaintiff Martinez Fischer.

554. In addition, Private Plaintiffs are preparing a motion to reopen Senator Huffman's deposition for improper assertions of the attorney-client privilege. Private Plaintiffs do not seek an extension to delay these proceedings, and an extension will not prejudice the Legislators.

For the foregoing reasons, Private Plaintiffs respectfully request that their motion be granted, and that their deadline to file the consolidated reply in support of their motions to compel regarding portions of depositions subject to legislative privilege objections be extended to August 31, 2022.

DATED: August 25, 2022

Respectfully submitted,

/s/ Nina Perales

Nina Perales

Fátima Menendez

Kenneth Parreno*

Julia Longoria

Mexican American Legal Defense and Educational
Fund (MALDEF)

110 Broadway Street, Suite 300

San Antonio, TX 78205

(210) 224-5476

Fax: (210) 224-5382

nperales@maldef.org

fmenendez@maldef.org

kparreno@maldef.org

jlongoria@maldef.org

Nikolas Youngsmith*

1016 16th Street NW, Suite 100

Washington, DC 20036

(202) 293-2828

Fax: (202) 293-2848

nyoungsmith@maldef.org

*Admitted *pro hac vice*

Counsel for LULAC Plaintiffs

Chad W. Dunn (Tex. Bar No. 24036507)
Brazil & Dunn
4407 Bee Caves Road
Building 1, Ste. 111
Austin, TX 78746
(512) 717-9855
chad@brazilanddunn.com

Mark P. Gaber*
Mark P. Gaber PLLC
P.O. Box 34481
Washington, DC 20043
(715) 482-4066
mark@markgaber.com

Jesse Gaines* (Tex. Bar No. 07570800)
P.O. Box 50093
Fort Worth, TX 76105
(817) 714-9988
gainesjesse@ymail.com

Molly E. Danahy*
P.O. Box 26277
Baltimore, MD 21211
(208) 301-1202
danahy.molly@gmail.com

Sonni Waknin*
10300 Venice Blvd. # 204
Culver City, CA 90232
(732) 610-1283
sonniwaknin@gmail.com

*Admitted *pro hac vice*

Counsel for Brooks Plaintiffs

Noor Taj*
P.A. State Bar No. 309594
Allison J. Riggs*
N.C. State Bar No. 40028
Hilary Harris Klein*
N.C. State Bar No. 53711
Mitchell Brown*
N.C. State Bar No. 56122

Katelin Kaiser*
N.C. State Bar No. 56799
SOUTHERN COALITION FOR SOCIAL
JUSTICE
1415 West Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380
Fax: 919-323-3942
Allison@southerncoalition.org
Noor@scsj.org
hilaryhklein@scsj.org
mitchellbrown@scsj.org
katelin@scsj.org

David A. Donatti
TX Bar No. 24097612
Ashley Harris
Texas Bar No. 24078344
Thomas Buser-Clancy
Texas Bar No. 24123238
Adriana Pinon
Texas Bar No. 24089768
ACLU FOUNDATION OF TEXAS, INC.
P.O. Box 8306
Houston, TX 77288

Tel. (713) 942-8146 Fax. (713) 942-8966
ddonnati@aclutx.org
aharris@aclutx.org
tbuser-clancy@aclutx.org
asegura@aclutx.org
Jerry Vattamala*
N.Y. State Bar No. 4426458
Susana Lorenzo-Giguere*
N.Y. State Bar No. 2428688
Patrick Stegemoeller*
N.Y. State Bar No. 5819982
ASIAN AMERICAN LEGAL DEFENSE AND
EDUCATION FUND
99 Hudson Street, 12th Floor
New York, NY 10013
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org

Yurij Rudensky*

N.Y. State Bar No. 5798210
BRENNAN CENTER FOR JUSTICE AT NYU
SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
rudensky@brennan.law.nyu.edu

*Admitted *pro hac vice*

Counsel for Fair Maps Plaintiffs

s/ Lindsey B. Cohan
Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

Jon Greenbaum*
Ezra D. Rosenberg*
Pooja Chaudhuri*
Sofia Fernandez Gold*
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street, Suite 900
Washington, DC 20005
(202) 662-8600
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org
sfgold@lawyerscommittee.org

Neil Steiner*
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

Robert Notzon
Texas Bar No. 00797934
THE LAW OFFICE OF ROBERT NOTZON
1502 West Avenue
Austin, Texas 78701

(512) 474-7563
robert@notzonlaw.com

Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208
Austin, Texas 78723-1157
(512) 322-9992
gbledsoe@thebledsoelawfirm.com
*Attorney only as to Texas NAACP's claims related
to Texas state senate and state house plans*

Janette M. Louard
Anthony P. Ashton
Anna Kathryn Barnes
NAACP OFFICE OF THE GENERAL COUNSEL
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577
jlouard@naacpnet.org
aashton@naacpnet.org
abarnes@naacpnet.org
Attorneys appearing of counsel

**Admitted pro hac vice*

Counsel for the Texas State Conference of NAACP

s/ George Quesada
George (Tex) Quesada
Texas Bar No. 16427750
Sean J. McCaffity
Texas Bar No. 24013122
SOMMERMAN, MCCAFFITY,
QUESADA & GEISLER, L.L.P.
3811 Turtle Creek Boulevard, Suite 1400
Dallas, Texas 75219-4461
(214) 720-0720
quesada@textrial.com
smccaffity@textrial.com

Joaquin Gonzalez
Texas Bar No. 24109935
Attorney at Law
1055 Sutton Dr.

San Antonio, TX 78228
jgonzalez@malc.org

Counsel for MALC

Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208
Austin, Texas 78723-1157
Telephone: 512-322-9992
gbledsoe@thebledsoelawfirm.com

Counsel for the Black Congresspersons

s/ Martin Golando
Martin Golando
Texas State Bar No. 24059153
Attorney at Law
2326 W. Magnolia
San Antonio, Texas 78201
(210) 471-1185
Martin.Golando@gmail.com

Counsel for Trey Martinez Fischer

CERTIFICATE OF CONFERENCE

I hereby certify that, on August 23, 2022, counsel for LULAC Plaintiffs, on behalf of Private Plaintiffs, conferred by email with counsel for the Legislators regarding the instant motion. On August 24, 2022, counsel for the Legislators stated that they would agree to an extension until August 29, 2022, but would oppose a request for an extension until August 31, 2022.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 25th day of August 2022.

/s/ Nina Perales

Nina Perales